

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.00-6312-CR-ROETTGER

UNITED STATES OF AMERICA

v.

JERMAINE C. WILLIAMS and
LOWEN ESPINUEVA,

DEFENDANTS.

GOVERNMENT'S FIFTH SUPPLEMENTAL RESPONSE TO STANDING DISCOVERY ORDER

The United States of America, in response to the Standing Discovery Order issued in this case file this second Supplemental Response which is alphabetized and numbered to correspond to that original order and states as follows:

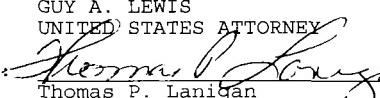
A.1. See enclosed transcripts of October 20, 2000 interviews of Jermaine Williams and Lowen Espinueva.

A.6. See enclosed reports of hair examination and curriculum vitae of Karen Lanning, FBI laboratory examiner Trace Evidence Unit.

See curriculum vitae of Douglas Murphy, FBI laboratory firearms and tool marks unit.

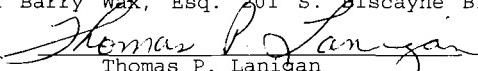
Respectfully submitted,

GUY A. LEWIS
UNITED STATES ATTORNEY

By: 
Thomas P. Lanigan
ASSISTANT UNITED STATES ATTORNEY

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Government's Response to Standing Discovery Order was mailed this 23th day of January ,2001 to: Darryl Wilcox, Assistant Federal Public Defender 111 NE 3rd Ave Fort Lauderdale, FL and Barry Wax, Esq. 201 S. Biscayne Blvd. Miami, FL 33131


Thomas P. Lanigan
ASSISTANT UNITED STATES ATTORNEY

cc: S/A Eric Miller, FBI

FEB 05 2001
CLERK'S OFFICE
S.D. OF FLA.
D.C.

2001 JUN 24

39/68



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

Report of Examination

Examiner Name Karen A. Lanning *KA*

Date December 8, 2000

Unit Trace Evidence

Phone No.: (202) 324-4353

Case ID No.: 192C-MM-96243

Lab No.: 001107009 IK RT

Results of Examinations:

Negroid head hairs suitable for meaningful microscopic comparison purposes were found on or in specimens Q1, Q3, Q20 and Q23. These hairs have been preserved on glass microscope slides.

Dark brown and black dog hairs suitable for meaningful microscopic comparison purposes were found on specimens Q2, Q3, Q19 and Q19.1. These hairs have been preserved on glass microscope slides.

No hairs or no other hairs suitable for meaningful microscopic comparison purposes were found on or in the submitted items.

No apparent textile fiber interchanges were detected between specimens Q1 through Q18 and Q23 and specimens Q19 and Q20.

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

Report of Examination

Examiner Name Karen A. Lanning ✓
Date January 5, 2001
Unit Trace Evidence Phone No. (202) 324-4353
Case ID No. 192C-MM-96243 Lab No. 001107009 IK RT KL
001212006 IK RT KL

Results of Examinations:

The Negroid head hairs previously removed from specimen Q23 exhibit the same microscopic characteristics as hairs in the K4 head hair sample identified as coming from JERMAINE WILLIAMS. Accordingly, these hairs are consistent with originating from JERMAINE WILLIAMS.

One hair from specimen Q23 has been removed for mitochondrial DNA examinations. This hair has been identified as Q23.1.

The comparison of the microscopic characteristics in hairs does not constitute a basis for absolute personal identification. The probative value of hair comparisons may be affected by the results of mitochondrial DNA analysis.

The Negroid head hairs previously removed from specimens Q1, Q3 and Q20 are microscopically dissimilar to the K4 head hair sample identified as coming from JERMAINE WILLIAMS.

Statement of Qualifications**Name of Lab:** FBI Laboratory Division, Washington, D.C.**Date:** 12/12/00**Name:** Karen A. Lanning**Job Title:** Physical Scientist**Discipline(s):** Trace Evidence**Education**

Institution

Dates attended

Major

Degree completed

Fort Hays State University 8/83-5/87

Biology

BS

Kansas State University 1/89-8/89

Chemical Science

Other training:

Introduction to Hairs and Fibers

Inter/Micro-92

Inter/Micro-94

International Symposium - Trace Evidence In Transition

Introduction to Wood Identification

Wood Identification Workshop

Textile Fundamentals

Color Measurement

Crime Scene Reconstruction and Evidence Collection/Documentation

Courtroom Experience:

Hairs and Fibers August 1989 - Present One hundred and one

Professional Affiliations:

Midwestern Association of Forensic Scientists August 1989 - Present

Employment History:**Job title:**

Physical Scientist

Employer:

FBI

Tenure:

April 1995 - Present

Principle duties:

Conduct examinations and comparisons of hairs, fibers, ropes, cordage and fabrics for criminal cases.

Job title:

Forensic Scientist

Employer:

Kansas Bureau of Investigation

Tenure:

August 1989 - April 1995

Principle duties:

Conduct examinations and comparisons of hairs, fibers, ropes, cordage and fabrics for criminal cases.

Job title:
Research Technician

Employer:
Baylor College of Medicine

Tenure:
June 1987 - January 1989

Principle duties:
Conduct research in the Department of Cell Biology

Other qualifications:

Speaker/Instructor

KLETC New Police and Sheriff Training - KBI Laboratory Services
Kansas Bureau of Investigation New Agent Training
Investigation School - Hair and Fiber Analyses
Forensic Scientist in Training - Hair Analysis
Introduction to Hairs and Fibers
Advanced Crime Scene School - Evidence Handling Issues
Introduction to Hairs and Fibers
Trace Evidence Seminar - Wichita, KS
Introduction to Hairs and Fibers
Trace Evidence School - South African Police Forensic Science Services, Pretoria
South Africa
Homicide School - Richmond, VA
Trace Evidence School - Introduction to Hairs - South African Police Forensic
Science Services, Pretoria, South Africa
Introduction to Fibers, Cleveland, OH



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To: SAC, Miami

Date: January 11, 2001

Case ID No.: 192C-MM-96243 -55

Lab No.: 001107009 IK RT KL
001212006 IK RT KL

Reference: Communications dated November 3, 2000 and December 7, 2000

Your No.: 192C-MM-96243 (P)

Title: JERMAINE WILLIAMS;
LOWEN ESPINUEVA;
BRINKS@ CITIBANK,
2789 UNIVERSITY DRIVE
CORAL SPRINGS, FL;
10-20-2000;
HOBBS ACT-ARMORED CARRIER;

Date specimens received: November 7, 2000 and December 12, 2000

Specimens received December 12, 2000 under cover of communication dated December 7, 2000 (001212006 IK RT):

K4 Head hair sample from JERMAINE WILLIAMS

K5 Blood sample from JERMAINE WILLIAMS

This report supplements and amends the FBI Laboratory report to your office dated December 8, 2000. For a complete listing of the submitted items, please refer to that report.

The specimen listing is amended as follows:

Q23.1 Hair from specimen Q23

The results of the trace evidence examinations are contained in this report.

DNA examinations are continuing and you will be subsequently advised of their results and of the disposition of the submitted items.

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535To SAC, Miami
 Attn: SA Erik C. Miller
 Squad C-1

Date December 12, 2000

Case ID No. 192C-MM-96243-44

Lab No. 001107013 KG

Reference Communication dated November 1, 2000

Your No.:

Title JERMAINE WILLIAMS;
 LOWEN ESPINUEVA;
 BRINKS @ CITIBANK,
 2789 UNIVERSITY DRIVE,
 CORAL SPRINGS, FLORIDA:
 10/20/2000;
 HOBBS ACT ROBBERY - ARMORED CARRIER

Date specimens received November 7, 2000

Specimens:

- Q24-Q25 Two (2) bullets (1B31, 1B32), recovered from vehicle
Q26 Bullet (1B3), recovered from ATM
Q27-Q32 Six (6) cartridge cases (1B9), from revolver
Q33 Cartridge case (1B3), from ATM
Q34-Q36 Three (3) shotshell cases (1B33), from vehicle
Q37-Q51 Fifteen (15) shot pellets (1B5), from ATM area
Q52-Q55 Four (4) shot pellets (1B7), from ATM area
Q56 Shot pellet (1B27), from victim

- Q57-Q59 Three (3) shotshell wad remnants (1B5) from ATM area
- Q60-Q67 Eight (8) cartridges (1B13), recovered with weapon
- Q68-Q70 Three (3) shotshells (1B14), recovered with weapon
- K1 .38 Special caliber Smith & Wesson revolver, Model 64, Serial Number BHJ6910
- K2 9mm Makarov pistol, unknown German manufacturer, Model Makarov, Serial Number F8539, with magazine
- K3 12-Gauge Mossberg shotgun, Model 500A, Serial Number L825206

The results of the firearms examinations are included in this report. The results of other examinations, including shot pattern distance determinations, will be the subject of future reports.



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

Report of Examination

Examiner Name: *Douglas P. Murphy* Date: December 12, 2000
Unit: Firearms / Toolmarks Phone No.: 202 324-4383
Case ID No. 192C-MM-96243 Lab No.: 001107013 KG

Results of Examinations:

Specimens Q24 and Q25 are .38 caliber hollow-point bullets which were identified as having been fired from the barrel of the K1 revolver.

Specimen Q26 is a .38 caliber (which includes 9mm Makarov) full metal jacket bullet which was identified as having been fired from the barrel of the K2 pistol.

Specimens Q27 through Q32 are .38 Special caliber cartridge cases bearing the headstamp of Speer and were identified as having been fired in the K1 revolver.

Specimen Q33 is a 9mm Makarov cartridge case bearing the headstamp of Norinco (China) and was identified as having been fired in the K2 pistol.

Specimens Q34 through Q36 are 12-gauge shotshell cases bearing the headstamp of Winchester and information indicating they were loaded with #2 (0.15 inch diameter) steel shot pellets. All three were identified as having been fired in the K3 shotgun.

Specimens Q37 through Q56 are steel shot pellets that are approximately 0.15 inches in diameter (#2 shot).

Specimens Q57 through Q59 are remnants of shotshell wadding that are physically consistent with those used in Winchester 12-gauge shotshells loaded with steel shot.

Specimens Q60 through Q67 are .380 Auto caliber cartridges that are consistent in design with those produced by Magsafe.

Specimens Q68 through Q70 are 12-gauge shotshells bearing the headstamp of Winchester and information indicating they are loaded with #2 (0.15 inch diameter) steel shot pellets. All three were identified as having been loaded into and extracted from the K3 shotgun.

The K1 through K3 firearms functioned normally when tested in the Laboratory.

FBI
LABORATORY
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To: SAC, Miami

Date: December 8, 2000

Case ID No.: 192C-MM-96243 -43

Lab No. 001107009 IK RT

Reference: Communication dated November 3, 2000

Your No. 192C-MM-96243 (P)

Title: JERMAINE WILLIAMS;
LOWEN ESPINUEVA;
BRINKS@ CITIBANK,
2789 UNIVERSITY DRIVE
CORAL SPRINGS, FL;
10-20-2000;
HOBBS ACT-ARMORED CARRIER;

Date specimens received: November 7, 2000

Specimens:

ITEMS FROM GETAWAY VEHICLE

Q1-Q2 Two (2) hats (Items #9 and #11)

Q3 Bandana (Item #8)

Q4 Section of carpet (Item #7)

Q5 Door handle (Item #10)

Q6 Piece of headliner (Item #13)

Q7 Piece of driver's side door material (Item #12)

ITEMS FROM GETAWAY VEHICLE RECOVERY SCENE

Q8-Q18 Eleven (11) debris packets (Items #2 - #4)

ITEM FROM TRANSPORT VEHICLE

Q19 Section of seat (Item #5)

Q19.1 Ruler (Not listed)

ITEM FROM HOSPITAL

Q20 Washcloth (Item #6)

ITEM FROM CRIME SCENE

Q21 Swab (Item #1)

ITEM FROM SUSPECT'S VEHICLE

Q22 Swab (Item #15)

ADDITIONAL ITEM

Q23 Debris (Item #14)

The results of the trace evidence examinations are contained in this report.

Other Laboratory examinations are continuing and you will be subsequently advised of their results and of the disposition of the submitted items.

Douglas P. Murphy
FBI Laboratory
Washington, D.C.

PRESENT ASSIGNMENT: Physical Scientist
Firearms-Toolmarks Unit
since December 1997

PAST ASSIGNMENT: Physical Science Technician
Firearms-Toolmarks Unit
February 1996 - December 1997

EDUCATION: Bachelor of Science Degree
in Physics from Eastern Illinois
University in Charleston, Illinois
August 1994

TRAINING: Qualified as a firearms and
toolmarks examiner in June, 1999

Conducted hundreds of examinations
during extensive training and since
qualification

Instructor at FBI Techniques in
Firearms Identification School and
Bullet Trajectory Reconstruction
School

Toured U.S. and foreign tool,
firearms and ammunition
manufacturing plants